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LAS VEGAS DEVELOPMENT, LLC
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11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 FEDERAL HOUSING FINANCE AGENCY,)
14 in its capacity as Conservator of Federal)
National Mortgage Association and Federal)
15 Home Loan Mortgage Corporation; FEDERAL)
NATIONAL MORTGAGE ASSOCIATION;)
16 and FEDERAL HOME LOAN MORTGAGE)
CORPORATION,)

Case No. 2:16-cv-01187-GMN-CWH

17 Plaintiffs,)
18)

19 vs.)

20 LAS VEGAS DEVELOPMENT GROUP, LLC;)
LAS VEGAS DEVELOPMENT, LLC; and)
21 LVDG, LLC,)

22 Defendants.)
_____)

23 **UNOPPOSED MOTION TO EXTEND TIME TO**
24 **RESPOND TO MOTION FOR SUMMARY JUDGMENT**
(First Request)

25 COMES NOW, Defendants, LAS VEGAS DEVELOPMENT GROUP, LLC; LAS
26 VEGAS DEVELOPMENT, LLC; and LVDG, LLC, and hereby present their unopposed motion
27 to extend the time in which they may respond to the Plaintiff's pending Motion for Summary
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1 Judgment, stating as follows:

- 2 1. On June 10, 2019, Plaintiffs filed a Motion for Summary Judgment herein [ECF
3 #41]. A response to said Motion was due on July 1, 2019.
- 4 2. Defendants' counsel had expected to complete the Opposition to the Motion for
5 Summary Judgment prior to the due date. However, a number of other matters
6 came up that made doing so impossible, including numerous other pending legal
7 matters and family obligations associated with Independence Day holiday. In
8 addition, Defendants' counsel hopes to discuss settlement and potentially narrow
9 the issues at hand.
- 10 3. Late in the day on July 1, 2019, Defendants' counsel sent an email to Plaintiffs'
11 counsel requesting a 2 week extension of time until July 15, 2019, in which to
12 respond to the pending Motion, together with a proposed stipulation to extend
13 time. Kelly Dove, Esq., counsel for Federal National Mortgage Association,
14 responded relatively immediately with her client's consent to the proposed
15 stipulation.
- 16 4. John Tennert, Esq., counsel for Federal Housing Finance Agency, and John
17 Maddock, III, Esq., counsel for Federal Home Loan Mortgage Corporation,
18 responded to counsel's email on July 2, 2019, advising that while they do not
19 oppose the requested extension, they feel that they cannot now so stipulate since
20 the original deadline has passed. Both Mr. Tennert and Mr. Maddock advised that
21 they will not oppose the instant Motion.
- 22 5. Defendants' counsel respectfully submits that the failure to submit a stipulation or
23 motion in advance of the existing deadline constitutes excusable neglect under the
24 circumstances herein.

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6. This Motion is made in good faith and not for purpose of delay.

NOW THEREFORE, Defendant, Thunder Properties, Inc., respectfully requests that this Court extend the time in which it may respond to Plaintiffs' pending Motion for Summary Judgment [ECF #41] until July 15, 2019.


Dated this 2nd day of July 2019.

ROGER P. CROTEAU & ASSOCIATES, LTD.

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**LAS VEGAS DEVELOPMENT
 GROUP, LLC; LVDG, LLC; AND
 LAS VEGAS DEVELOPMENT, LLC**

IT IS SO ORDERED.

DATED this 3 day of July, 2019.


Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of July, 2019, I served via the United States District Court CM/ECF electronic filing system, the foregoing **UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT** (First Request) to the following parties:

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